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Attorneys for Defendants
Dreamdealers USA, LLC d/b/a Exotics Racing,
David Perisset, and Roman Thievin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EDWARD B. DOUGLAS, an individual,
Plaintiffs.

Case No. 2:17-cv-02134-APG-BNW

vs.
DREAMDEALERS USA, LLC d/b/a
EXOTICS RACING, A Nevada limited
liability company, DAVID PERISSET, an
individual, and ROMAN THIEVIN, an
individual.

**PROPOSED STIPULATION AND ORDER
TO EXTEND JOINT PRETRIAL ORDER
DEADLINE**

(SECOND REQUEST)

Defendant.

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and 26-4, Defendants, DREAMDEALERS USA, LLC d/b/a EXOTICS RACING, DAVID PERISSET, and ROMAN THIEVIN, and Plaintiff, EDWARD B. DOUGLAS, by and through their respective attorneys of record, hereby stipulate for an extension of time to file the Joint Pretrial Order of November 25, 2019 to January 24, 2020. This is the second request for an extension to file the Joint Pretrial Order. The requested extension is sought in good faith and not for purposes of undue delay.

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1 Good cause and excusable neglect exist because, in preparation for the Joint Pretrial Order, the
2 parties have engaged in meet and confer efforts and supplemental discovery responses have been
3 made, including Plaintiff's Second Supplemental Responses to Defendant's Interrogatories,
4 Plaintiff's Third Supplemental Responses to Defendant's Requests for Production of Documents,
5 and Plaintiff's Fourth Supplemental Responses to Defendant's Requests for Production of
6 Documents, all of which are relevant to the joint pretrial order. Moreover, the parties have agreed to
7 engage in further settlement negotiations, including the possibility of a formal mediation, and wish
8 to avoid the additional expense of preparing the Joint Pretrial Order in order to conserve resources
9 for potential settlement.

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12 Dated: November 20, 2019

13 Respectfully submitted,

15 /s/ Dustin L. Clark, Esq.
16 DUSTIN L. CLARK, ESQ.
17 HOLLEY DRIGGS WALCH
18 FINE PUZEY STEIN & THOMPSON
19 Attorney for Plaintiff

20 Dated: November 20, 2019

21 Respectfully submitted,

22 /s/ Marcus B. Smith, Esq.
23 WENDY M. KRINCEK, ESQ.
24 MARCUS B. SMITH, ESQ.
25 LITTLER MENDELSON, P.C.
26 Attorneys for Defendants

27 **ORDER**

28 **IT IS SO ORDERED.**

29 Dated: November 21 , 2019.

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31 UNITED STATES MAGISTRATE JUDGE

32 4819-3639-7736.1 087825.1002